


THE MARKS LAW FIRM, P.C.

Application DENIED without prejudice. No discovery extensions will be granted absent a showing of diligence. If the parties seek an extension, they shall file a joint letter describing in more detail the progress they have made, the complexities mentioned below, the discovery that remains and the timeline on which it will be completed.

Dated: March 14, 2023
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

RE: **Henry Tucker v. C.S. Babylon Marine, Inc.**
Index: 1:22-cv-03642-LGS

Dear Judge Schofield,

The Parties respectfully provide this joint status letter in accordance with Your Honor's January 6, 2023 Civil Case Management Plan and Scheduling Order [Dkt. 42].

Defendant filed its Answer to Plaintiff's complaint on January 6, 2023. Subsequent to filing its Answer, Defendant retained new counsel who filed a notice of appearance on January 31, 2023. To date, no motions have been filed except Defendant's motion to substitute new counsel for prior counsel and a *pro hac vice* motion, both of which the Court granted [Dkt., 48, 49].

In terms of discovery, to date, the Parties have exchanged initial disclosures and have served written discovery demands. The parties have not yet served responses to written discovery and are engaged in informal discussions regarding this matter. At this time, the Parties are continuing to work cooperatively on discovery and have made good progress, however the Parties do anticipate the need to extend the original deadlines to complete fact and expert discovery set forth in Your Honor's Scheduling Order [Dkt. 42], given the complexity of the issues and Defendant's retention of new counsel at the end of January. The parties request a case management conference at Your Honor's convenience to discuss scheduling.

We thank you and the Court for its time and consideration on this matter.

Jointly Submitted,

The Marks Law Firm, P.C.

Faegre Drinker Biddle & Reath LLP

By: /s/ Bradly G. Marks
Bradly G. Marks

By: /s/ Matthew J. Fedor
Matthew J. Fedor